

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

AUSTIN ONUSZ, CEDRIC KEES VAN
PUTTEN, NICHOLAS J. MARSHALL and
HAMAD DAR, on behalf of themselves and all
others similarly situated,

Plaintiffs,

v.

WEST REALM SHIRES INC., WEST REALM
SHIRES SERVICES INC. (D/B/A FTX US),
FTX TRADING LTD., ALAMEDA
RESEARCH LLC, SAM BANKMAN-FRIED,
ZIXIAO WANG, NISHAD SINGH and
CAROLINE ELLISON,

Defendants.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Adv. Pro. No. 22-50513 (JTD)

Ref. Nos. 1, 23, 30 & 37

CERTIFICATION OF COUNSEL

I, Matthew B. McGuire, counsel to the above-captioned debtors and debtors-in-possession (collectively, the “Debtors”), hereby certify as follows to the best of my knowledge, information and belief:

1. On December 27, 2022, Plaintiffs Austin Onusz, Cedric Kees van Putten, Nicholas J. Marshall and Hamad Dar (collectively, the “Plaintiffs”) filed the *Adversary*

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

Complaint for Declaratory Judgment and Violations of Common Law (the “Complaint”) [Adv. D.I. 1] in the above-captioned adversary proceeding against, among others, West Realm Shires Inc., West Realm Shires Services Inc. (d/b/a FTX US), FTX Trading Ltd., Alameda Research LLC (collectively, the “Debtor Defendants”).

2. On January 5, 2023, Plaintiffs served a copy of the Complaint on the Debtor Defendants.

3. On February 3, 2023, the Court entered the *Order Approving Stipulation Regarding Extension of the Response Deadline* [Adv. D.I. 23], extending the Debtor Defendants’ deadline to answer, move or otherwise respond to the Complaint from February 6, 2023 to April 7, 2023 (the “Response Deadline”).

4. Pursuant to rule 7004-2 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware, Plaintiffs noticed the pretrial conference (the “Pretrial Conference”) for April 12, 2023 at 1:00 p.m.

5. On April 10, 2023, the Court entered the *Order Approving Second Stipulation Regarding Extension of the Response Deadline* [Adv. D.I. 30], further extending the Debtor Defendants’ Response Deadline to April 27, 2023 and adjourning the date of the Pretrial Conference to May 17, 2023.

6. On April 28, 2023, the Court entered the *Order Approving Third Stipulation Regarding Extension of the Response Deadline* [Adv. D.I. 37], further extending the Debtor Defendants’ Response Deadline and adjourning the date of the Pretrial Conference to June 28, 2023.

7. The Plaintiffs and the Debtor Defendants (together, the “Parties”) have conferred and agree that the Debtor Defendants’ Response Deadline shall be further extended to July 31, 2023 and the date of the Pretrial Conference shall be adjourned to a date to be determined.

8. The Parties’ stipulation is attached as **Exhibit A** to the proposed form of order approving the stipulation, which is annexed hereto as **Exhibit 1** (the “Order”).

9. Accordingly, the Parties respectfully request that the Bankruptcy Court enter the Order at its earliest convenience.

Dated: June 15, 2023
Wilmington, Delaware

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